COMMONWEALTH OF PENNSYLVANIA COUNTY OF: NORTHAMPTON

Magisterial District Number: 03-2-08 MDJ: Hon. John C. Capobianco Address: 136 S. Main Street

Nazareth, PA 18064



JAKE

First Name

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.

DEFENDANT:

(NAME and ADDRESS):
RICHARD | IOWNE

COPY

Telephone: (610)759-6424	120 Parker Avenue Easton, PA 18042	
☐ 1-Felony Full ☐ 5-Felony Pending E☐ 2-Felony Limited ☐ 6-Felony Pending E☐ 3-Felony Surrounding States ☐ A-Misdemeanor Fu☐ 4-Felony No Extradition ☐ B-Misdemeanor Lin	Extradition Determ. D-Misdemeanor No Extradition II E-Misdemeanor Pending Extra mited	dition dition
	IveScan Number 41-251	mber Request Lab Services? ☐ YES ⊠ NO
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I, SEAN M. MCGLINN (Name of the Afflant) of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political State do hereby state: (check appropriate box) 1. I accuse the above named defendant who like the course the defendant whose name is unknown.	dral PA0222400 (Police Agency ORI Num ves at the address set forth above	ed Afflant ID Number & Badge #
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in NORTHAMPTON County [48] (County Code)	on or ab <u>out 01/01/2018 - 08/15/20</u>)18

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4. This complaint consists of	the preceding page(s)) numbered 1 throug	h			
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efendant Name:

JAKE

Middle: **RICHARD**

Last. TOWNE

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Sean M. McGlinn, Supervisory Special Agent, Badge 572, of the Pennsylvania Office of Attorney General, Bureau of Criminal investigations assigned to the Criminal Prosecutions Section, being duly sworn according to law, deposes and says:

Your Affiant is empowered by law to conduct investigations of and to make arrests for violations of the Pennsylvania Crimes Code and the Pennsylvania Election Code, among other things.

On November 5, 2019, the 44th Statewide Investigating Grand Jury Issued a Presentment known as "Amended Presentment No 1" (hereinafter; Presentment) recommending that criminal charges be filed against Jake Towne for violations of the Pennsylvania Election Code and the Pennsylvania Crimes Code. The aforementioned Presentment was accepted by the Honorable Lillian Harris Ransom, Supervising Judge of the 44th Statewide Investigating Grand Jury by Order dated November 6, 2019. A copy of the Presentment and the Order accepting the Presentment is attached hereto and incorporated herein by reference, recommends charges be filed by the Attorney General or his designee against the defendant as follows:

Count 1: False Signatures and Statements in Nomination Petitions and Papers, 25 P.S. §3513

Count 2: Perjury, 25 P.S. §3502

Count 3: Tampering with Records or Identification, 18 Pa. C.S. §4104(a) Count 4: Unsworn Falsification to Authorities, 18 Pa. C.S. §4904 (b)

Count 5: Tampering with Public Records or Information, 18 Pa. C.S. §4911(a)(2)

Having read and reviewed the Presentment, and after having participated in this investigation and considering all the facts and circumstances, your Affiant is adopting the Presentment and Incorporating it fully into this Affidavit of Probable Cause. Your Affiant avers that the testimony before the 44th Statewide Investigating Grand Jury is consistent with the information contained within Presentment No. 1 and the information developed within the course of the investigation specified herein. Furthermore, Presentment No. 1 shows on its face that it is based upon evidence which the 44th Statewide Investigating Grand Jury reviewed and evaluated which included sworn testimony and physical evidence presented to it. Your Affiant has reviewed the evidence presented before the 44th Statewide Investigating Grand Jury and finds that it comports with the findings of the general investigation.

I, SEAN M. MCGLINN, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE, FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

(Signature of Affiant)

Sworn to me and subscribed before me this

day of

My commission expires first Monday of January,

Magister NORTHAMPTO'

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: NORTHAMPTON

Magisterial District Number: 03-2-08 MDJ: Hon. John C. Capoblanco Address: 136 S. Main Street

Nazareth, PA 18064



POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.

DEFENDANT:

AMBER ... First Name

NICOLE Middle Name

159 Wood Street Nazareth, PA 18064



Telephone: (610)759-6424	Nazareth, PA 18064		
□ 1-Felony Full □ 5-Felony Pending E □ 2-Felony Limited □ 6-Felony Pending E □ 3-Felony Surrounding States □ A-Misdemeanor Full □ 4-Felony No Extradition □ B-Misdemeanor Lim	xtradition Determ. ☐ D-Misdemeanor I ☐ E-Misdemeanor iited ☐ F-Misdemeanor	r Pending Extradition r Pending Extradition	Distance:
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SDAG NICOLE FORZATO (Name of the attorney for the Commonwealth)	(Signature of the attorney for the Commonw	SDA-G wealth)	/_/ (Date)
I, SEAN M. MCGLINN (Name of the Affiant) of Pennsylvania Office of Attorney Gene (Identify Department or Agency Represented and Political St do hereby state: (check appropriate box) 1. I accuse the above named defendant who live I accuse the defendant whose name is unknown.	eral PA022 ubdivision) (Police Age wes at the address set forth above	ency ORI Number) e	Number & Badge #
☐ I accuse the defendant whose name and po therefore designated as John Doe or Jane D	pular designation or nickname are	e unknown to me and	d whom I have
with violating the penal laws of the Commonw	vealth of Pennsylvania at []	Northamp on Code) (Place-Politic	iton ai Subdivision)

et Number: Date Filed:	OTN/LiveScan Number	POLICE CRIMINAL COMPLAIN Complaint/Incident Number 41-251
ndant Name: First: AMBER	Middle: NICOLE	Last: CORRELL
made.	r a summons be issued and that the defen n this complaint are true and correct to the e subject to the penalties of Section 4904	dant be required to an average charges I have best of my knowledge or information and of the Crimes Code (18 Pa.C.S. § 4904) relating
to unsworn falsification to auth	orities.	
4. This complaint consists of the	preceding page(s) numbered 1 through _	
System of Pennsylvania that reinformation and documents.	equire ming confidential information and so	
The acts committed by the accur of Pennsylvania and were contra (Before a warrant of arrest car issuing authority, and attache	n be issued, an affidavit of probable cau	the peace and dignity of the Commonwealth ation of the statutes cited. se must be completed, sworn to before the
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	· (Year)	(Signature of Afflant)
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AND NOW, on this date NOV	. 21, 2019 I certify that the	
AND NOW, on this date NOV	t be completed before a warrant can be Issued. Add Cal	complaint has been properly completed and verified
AND NOW, on this date NOV An affidavit of probable cause must 03 - 2 - 08	t be completed before a warrant can be Issued. Add Cal	complaint has been properly completed and verified
AND NOW, on this date NOV An affidavit of probable cause must 03 - 2 - 08	t be completed before a warrant can be Issued. Add Cal	complaint has been properly completed and verified
AND NOW, on this date NOV An affidavit of probable cause must	t be completed before a warrant can be Issued. Add Cal	complaint has been properly completed and verified

he acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. In there is more than one offense, each offense should be numbered chronologically. It is not sufficient, in a summary case, you must clie the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated, thout more, is not sufficient, in a summary case, you must clie the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated, as age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not listed. If the Identity of an account must be established, list only the last four digits. 204 PA.Code \$\$ 213.1 – 213.7.) Choose Attempt Section Subsection Conspiracy Number of Victims Age 60 or Older Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code PennDOT Data: (Cit applicable) Account Number: Account Number of Victims Age 60 or Older Section Subsection PA Statute (Title) Counts Grade NCIC Offense UCR/NIBRS Code PennDOT Data: (Cit applicable) Account Number: Account Number of Victims Age 60 or Older Section Subsection PA Statute or ordinance): FORGERY Cots of the accused associated with this Offense: The defendant by her own conduct: did knowingly execute a writing so that it purported to be a act of another, that other person did not authorize the writing and she actd with the Intent to defraud another person. To WIT: the defendant did forge estimature of twenty-five people, without their consent, on a Commonwealth of Pennsylvania 2018 Nomination Paper, Minor Political Party, Page 1039. That ordinate Paper was then submitted to the Pennsylvania Department of State as a true document. PA Station Title) Counts Grade NCIC Offense UCR/NIBRS Code Code UCR/NIBRS Code Code Number UCR/NIBRS Code NCIC Offense UCR/NIBRS Code NCIC Offense UCR/NIBRS Code NCIC Offense UCR/NIBRS Code NCIC Offense UCR/NIBRS Code	E.		.	\$ PO	LICE CRIMINA	L COMPLAINT
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AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Sean M. McGlinn, Supervisory Special Agent, Badge 572, of the Pennsylvania Office of Attorney General, Bureau of Criminal investigations assigned to the Criminal Prosecutions Section, being duly sworn according to law, deposes and says:

Your Affiant is empowered by law to conduct investigations of and to make arrests for violations of the Pennsylvania Crimes Code and the Pennsylvania Election Code, among other things.

On November 5, 2019, the 44th Statewide Investigating Grand Jury issued a Presentment known as "Amended Presentment No 1" (hereinafter: Presentment) recommending that criminal charges be filed against Amber Correll for violations of the Pennsylvania Election Code and the Pennsylvania Crimes Code. The aforementioned Presentment was accepted by the Honorable Lillian Harris Ransom, Supervising Judge of the 44th Statewide Investigating Grand Jury by Order dated November 6, 2019. A copy of the Presentment and the Order accepting the Presentment is attached hereto and incorporated herein by reference, recommends charges be filed by the Attorney General or his designee against the defendant as follows:

Count 1: Forgery, 18 Pa. C.S. §4101(a)(2)

Count 2: Identity Theft, 18 Pa. C.S. §4120(a)

Count 3: False Signatures and Statements in Nomination Petitions and Papers, 25 P.S. §3513

Count 4: Tampering with Records or Identification, 18 Pa. C.S. §4104(a)

Count 5: Tampering with Public Records or Information, 18 Pa .C.S. §4911(a)(1)

Having read and reviewed the Presentment, and after having participated in this investigation and considering all the facts and circumstances, your Affiant is adopting the Presentment and incorporating it fully into this Affidavit of Probable Cause. Your Affiant avers that the testimony before the 44th Statewide Investigating Grand Jury is consistent with the information contained within Presentment No. 1 and the information developed within the course of the investigation specified herein. Furthermore, Presentment No. 1 shows on its face that it is based upon evidence which the 44th Statewide Investigating Grand Jury reviewed and evaluated which included sworn testimony and physical evidence presented to it. Your Affiant has reviewed the evidence presented before the 44th Statewide Investigating Grand Jury and finds that it comports with the findings of the general investigation.

I, SEAN M. MCGLINN, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT BEQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

(Signature of Affiant)

Sworn to me and subscribed before me this

day of

Magisterial District Judge

My commission expires first Monday of January.

INTRODUCTION

We, the members of the Forty-Fourth Statewide Investigating Grand Jury, having received and reviewed evidence pertaining to violations of the Pennsylvania Crimes Code and Election Code occurring in Northampton County pursuant to Notice of Submission of Investigation Number 28, do hereby make the following findings of fact and recommendation of charges:

FINDINGS OF FACT

The Grand Jury conducted an investigation into fraudulent activity associated with the 2018 nomination paperwork for Libertarian Party candidates seeking public office. Special Agent Sean McGlinn ("SA McGlinn") of the Pennsylvania Office of Attorney General ("OAG") appeared before the Grand Jury and testified that the matter was brought to the attention of the OAG in August 2018 via a letter advising that the nomination papers filed with the Pennsylvania Department of State ("DOS") on July 27, 2018 and August 1, 2018 contained forged signatures and other irregularities. The correspondence included two notarized affidavits by C.M. and E.F., two female registered voters who resided in the 7th Congressional District in Northampton County. Each affidavit advised that the signature affixed to the corresponding nomination paper was not the signature of the purported signer, and that neither gave anyone authorization to sign the nomination papers in her stead.

The Grand Jury learned that for third party candidates seeking elected positions such as Governor, Lieutenant Governor, Senator, Congressperson, and/or a member of the Pennsylvania General Assembly to obtain ballot access for the 2018 general election, the candidates were required to file their nomination papers signed by "qualified electors" with the DOS by August 1, 2018. Each qualified elector was required to sign and print his or her name and provide his or her home address. Each elector was further required to list the date on which he or she signed the

document. In order to be eligible for ballot access, third party candidates needed to collect a certain number of signatures from qualified electors. The number of required signatures was determined by the particular position that was sought. Candidates submitting nomination papers containing less than the requisite number of signatures were not eligible to be on the ballot.

The Grand Jury heard testimony indicating that OAG agents interviewed C.M. and E.F. Specifically, the Grand Jury learned that after reviewing the nomination paper identified as "page 243" and filed with DOS on July 27, 2018, C.M. advised that she did, in fact, sign the document. E.F., however, confirmed that she did not sign the nomination paper identified as "page 1039" and filed with DOS on August 1, 2018.

The Grand Jury learned that there were a total of 25 signatures on "page 1039" and that 23 of those individuals were located and interviewed by OAG agents. A redacted copy of "page 1039" is set forth immediately below. Notably, even with just a glance the appearance of "page 1039" reveals striking similarities in the handwriting contained therein.

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NOTE: THIS SYNTEMENT MUST SE COMPLETED AFTER ALL SIGNATURES HAVE GEEN CRIABISC.

Each of the 23 individuals viewed his or her purported signature on "page 1039" and each person advised that they did not sign the document. Further, the Grand Jury heard testimony that each of the 23 individuals confirmed to OAG agents that he or she did not give anyone else permission to sign the nomination paper on his or her behalf. Moreover, the Grand Jury learned that two of the 23 individuals who were interviewed also noticed signatures on "page 1039" purporting to be the signatures of their spouses. They confirmed that the purported signatures of their spouses were forged, as well. As such, the Grand Jury learned that not one signature purporting to be that of a qualified elector supporting ballot access on "page 1039" was real or authorized.

Agent McGlinn testified that through the course of his continued investigation, he learned that Jake Towne ("Towne") signed as the nomination paper circulator for 35 separate pages, including "page 1039." Through his signature in Section D of "page 1039," he swore that all of the information contained in the document was true and that the signors were qualified electors. The evidence further revealed that Towne had been a Libertarian party candidate for public office in 2010, 2017 and 2018 and, in fact, was the elected auditor of Lower Nazareth Township in 2017. The Grand Jury learned that Towne had worked his way up through the ranks of the Northampton County Libertarian party. He served as the county party's treasurer and secretary and is currently now the president. Through a combination of his own experience in seeking public office, as well as his years of service to the party, he had extensive experience in obtaining ballot access. However, the investigation revealed that Towne did not actually circulate all of the nomination papers which he signed and attested to as the circulator.

Instead, the investigation revealed that Towne advertised on Facebook that he sought circulators for nomination papers for Libertarian candidates and offered to pay for the signatures

collected. The Grand Jury learned that it is not illegal to pay people to circulate nomination papers on behalf of candidates. However, the individual who actually obtains the signatures from qualified electors must sign as the circulator on the particular nomination paper(s). Agent McGlinn testified that Towne posted on a Facebook platform seeking assistance in obtaining signatures in July 2018. The Grand Jury learned that people affirmatively responded to his request for assistance.

The Grand Jury heard testimony that Amber Correll ("Correll") volunteered to obtain signatures in return for payment from Towne. Correll completed "page 1039" and submitted it to Towne. She advised that he instructed her not to sign the back of the document. She also advised that she was paid \$2.00 per signature and she did not tell Towne or anyone else that she forged the names, signatures and personal information. She admitted to Agent McGlinn that she did not have permission from the individuals to use their identities in this matter.

Agent McGlinn testified that through the course of the investigation, he learned from Ed Reagan that on May 8, 2019 Towne told him [Reagan] that he had paid a woman to collect the signatures on "page 1039" and that the signatures were valid but all of the other information was written in her handwriting. Thus, he acknowledged that he [Towne] did not, in fact, circulate the document.

The Grand Jury learned that C.R. saw the request for assistance through Facebook and, on July 14, 2018, she advised Towne that she was interested in obtaining signatures for him for \$2.00 per signature. She obtained blank nomination papers from him thereafter. She returned the completed nomination paper identified as "page 958" to him on or about July 26, 2018. She did not fill out the circulator's statement on the back of "page 958," however. Then, on Sunday, July

29, 2018 at 7:43 a.m., Towne contacted C.R. again to ask if she had other signatures for him. He advised through a text message:

We are so close to getting Ed [Reagan, a candidate for State Representative] on the ballot- was just checking in to see if you were collecting any in the Bangor/East Bangor/Roseto/ Nazareth boro/Stockertown/Tatamy area, they will be driven to Harrisburg either Wednesday or Tuesday so would need them by Monday evening — will up the pay to \$2.50 per signature in the above area, ones from elsewhere in Northampton I'll pay whatever was in our contract. If you don't plan to collect, that ok (sic) too but please let me know this. It's going to be close. Thanks!! Jake'

The Grand Jury learned that C.R. did obtain three additional signatures which are located on "page 1040." Towns was not present when she obtained any of the signatures. For unknown reasons, C.R. did not sign the statement of the circulator on either page. The records clearly show that Towns filled out both.

Agent McGlinn testified that the OAG engaged Khody Detwiler ("Detwiler"), Forensic Document Examiner, to conduct an analysis of the signatures on "page 1039." Detwiler was provided with copies of the Pennsylvania driver's license signatures and voter registration card signatures for all 25 of the individuals listed on "page 1039." He was also provided handwriting exemplars from 17 of the 25 individuals. He advised to a reasonable degree of professional certainty that all 25 signatures were forged.

Detwiler was also provided handwriting exemplars from Towne, Correll and a few other individuals. He concluded to a reasonable degree of professional certainty that Correll signed the names of 12 of the 25 individuals. He further opined that it is probable that she also signed three additional names on the page; however, he could not say to a degree of profesional certainty that she signed the names of the other 10 individuals. Detwiler opined that Correll wrote the bulk of the questioned handwritten text on "page 1039." Further, Detwiler advised that Towne did sign

pages 958, 1039 and 1040 in section D as the "Statement of Circulator" despite the fact that the evidence established that he never circulated those pages.

As previously stated, the Grand Jury heard evidence that nomination papers are filed with the DOS and the information contained therein is relied upon by DOS in order to give qualified individuals ballot access for the general elections in Pennsylvania. Accordingly, using the signature and identifying information of 25 individuals without their consent and for payment in order to help a candidate obtain ballot access in Pennsylvania was unlawful.